

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

FILED  
2025 SEP -4 PM 12:39

In re:

**GREEN COPPER HOLDINGS, LLC Case No. 25-10088-T  
COPPER TREE, INC..**

**INN AT PRICE TOWER, INC.,** Substantively Consolidated

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF OKLAHOMA

**MOTION FOR PROTECTIVE ORDER**

Comes now, Cynthia Blanchard, pro se, and respectfully moves this Court pursuant to Federal Rule of Civil Procedure 26(c), made applicable to bankruptcy proceedings by Bankruptcy Rules 7026 and 9014, for a protective order regarding discovery sought by Craig Brand, who has entered appearances in this case in connection with certain claim objections and related matters.

**Background**

1. Mr. Brand has indicated his intent to notice my deposition in connection with his objection to the proposed settlement with the Frank Lloyd Wright Conservancy.
2. I am not a party to this contested matter. The Chapter 7 Trustee is the fiduciary with full control over the debtor's records and information.
3. Mr. Brand has filed numerous objections and is attempting to involve me personally in ways that I believe are harassing and intended to create undue burden.
4. Subjecting me to deposition under these circumstances would be duplicative, unnecessary, and oppressive, given that the Trustee is the proper representative of the estate.

### **Relief Requested**

Pursuant to Rule 26(c), I respectfully request that the Court enter a protective order:

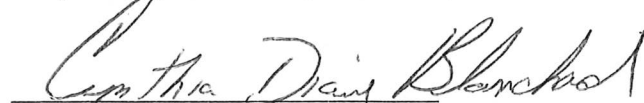
- Prohibiting Mr. Brand from noticing or taking my deposition in this matter without prior leave of Court; or, in the alternative,
- If a deposition is permitted, limiting its scope strictly to issues directly relevant to the Frank Lloyd Wright Conservancy settlement objection, limiting duration to no more than two hours, and prohibiting inquiry into any personal matters, including but not limited to finances, private family matters, health, unrelated litigation, or into issues that have already been resolved in prior orders of this Court, as well as any issues outside the scope of this objection.

### **Conclusion**

For the foregoing reasons, I respectfully request that the Court grant this Motion for Protective Order and such other relief as it deems just and proper.

Dated: September 4, 2025

Respectfully submitted,

A handwritten signature in cursive script, reading "Cynthia Diane Blanchard", written over a horizontal line.

**Cynthia Diane Blanchard, pro se**  
414 SE Washington Blvd. Ste. 205  
Bartlesville, OK 74006  
310-435-5707

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2025, I mailed a true and correct copy of the foregoing **Motion For Protective Order** via U.S. Mail, postage prepaid, to the following:

**Patrick J. Malloy III**

Chapter 7 Trustee  
401 South Boston Avenue, Suite 500  
Tulsa, OK 74103

**Karen Walsh**

Office of the United States Trustee  
224 South Boulder Avenue, Suite 225  
Tulsa, OK 74103

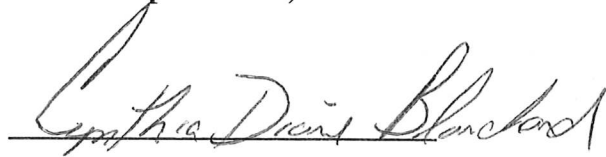
**Craig A. Brand, ESQ.**

Craig Brand Law Firm  
11222 Oak Shore Lane  
Clermont, FL. 34711

**Mark A. Craige, Esq.**

Crowe & Dunlevy, P.C.  
222 N. Detroit Avenue, Suite 600  
Tulsa, OK 74120

**Dated: September 4, 2025**

A handwritten signature in cursive script, reading "Cynthia Diane Blanchard", written over a horizontal line.

**Cynthia Diane Blanchard, pro se**  
**414 SE Washington Blvd. Ste. 205.**  
**Bartlesville Ok 74006**  
**310-435-5707**